

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CENTRAL PENSION FUND OF THE)	
INTERNATIONAL UNION OF)	
OPERATING ENGINEERS AND)	
PARTICIPATING EMPLOYERS, <i>et al.</i> ,)	
)	CIVIL ACTION
Plaintiffs,)	
)	NO. 24 C 1362
vs.)	
)	JUDGE THOMAS M. DURKIN
ELMAR HOTEL MANAGEMENT, LLC,)	
a Michigan limited liability company,)	
d/b/a INN OF CHICAGO,)	
)	
Defendant.)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

Plaintiffs, by their attorneys, and pursuant to Federal Rule of Civil Procedure Rule 55(b), move for entry of judgment by default against Defendant, ELMAR HOTEL MANAGEMENT, LLC, a Michigan limited liability company, d/b/a INN OF CHICAGO, in the total amount of \$139,562.24, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$2,381.25.

On February 27, 2024, the Summons and Complaint was served on the Defendant (by tendering a copy of said documents to its Registered Agent, Registered Agents, Inc., c/o Alena Bradley, Clerk) at the registered office of record in Illinois (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on March 19, 2024. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment pursuant to F.R.Civ.P. Rule 55(b).

/s/ Laura M. Finnegan

Laura M. Finnegan
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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 10th day of May 2024:

Registered Agents, Inc., Registered Agent for
Elmar Hotel Management, LLC
2501 Chatham Road, Suite R
Springfield, IL 62704-4188

/s/ Laura M. Finnegan

Laura M. Finnegan
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